



Debevoise & Plimpton LLP
66 Hudson Boulevard
New York, NY 10001
+1 212 909 6000

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 4/16/2025

March 24, 2025

BY ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Shalik Jenkins*, 20 Cr. 78-4 (AT)

Dear Judge Torres:

We write on behalf of defendant Shalik Jenkins in the above-captioned matter to request to file under seal Exhibits B, C, D, E, F, G, I, and J to the Letter Brief in Support of Mr. Jenkins' Bail Review Application (Dkt. 524). We make this request in the interest of protecting the safety and privacy interests of various third parties and of Mr. Jenkins.

Exhibits B, G, I, and J are documents containing confidential medical and personally identifiable information relating to Mr. Jenkins and third parties, including the Complainant and Mr. Jenkins' aunt. We will send these to the Court via email.

Exhibits C, D, E, and F are digital video files which contain footage of Mr. Jenkins and several non-parties to this litigation, including the Complainant and Mr. Jenkins' daughter, aunt, and neighbors. We will send these to the Court via a secure file sharing service. We can also provide a physical copy on an external drive if the Court so directs.

While a presumption of public access applies to judicial documents, *i.e.*, documents relevant to the performance of the judicial function and useful in the judicial process, the weight of the presumption is "governed by the role of the material at issue" and the resulting value of such information to the public. *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119 (2d Cir. 2006). Courts must also balance against the weight of the presumption of any countervailing factors such as "the privacy interests of those resisting disclosure," *id.* at 120, including "the degree to which the subject matter is traditionally considered private rather than public" and the "nature and degree of injury" resulting from disclosure. *United States v. Amodeo*, 71 F.3d 1044, 1051 (2d Cir. 1995).

The Honorable Analisa Torres

2

March 24, 2025

Out of concern for the safety and privacy interests of Mr. Jenkins and the third parties whose personal information and likenesses are contained within Exhibits B, C, D, E, F, G, I, and J, we respectfully request to file these exhibits under seal.¹

Respectfully submitted,

/s/ Douglas Zolkind


Douglas Zolkind
Attorney for Shalik Jenkins

cc: Andrew K. Chan, Assistant United States Attorney (via *ECF*)
Justin V. Rodriguez, Assistant United States Attorney (via *ECF*)
Emily A. Johnson, Assistant United States Attorney (via *ECF*)
Matthew J. King, Assistant United States Attorney (via *ECF*)

GRANTED *nunc pro tunc*.

SO ORDERED.

Dated: April 16, 2025
New York, New York



ANALISA TORRES
United States District Judge